

EXHIBIT 13

From: [Frank, Noah S.](#)
To: [Adi Sirkes](#); [Elizabeth Wilkerson](#); [Brandon Allen](#); [Chris Reynolds](#); [Nathan Smith](#); [Christopher Ryan](#); [Graves, Charles Tait](#); [Marisol Ellis](#); [Alex Meir](#); [Mason Malone](#); [Jim Weiss](#)
Cc: [IBM LzLabs Service](#); [Deron Dacus](#); [Heffernan, Jeannie](#); [Merideth, Vicki](#); [#IBM LzLabs](#); [Mekbib Solomon](#)
Subject: IBM v. LzLabs - Mogensen Deposition Scheduling
Date: Wednesday, March 27, 2024 10:07:12 AM

Counsel,

Ms. Kelly Mogensen is available to sit for deposition on April 4, 2024 near White Plains, NY. IBM will be designating Ms. Mogensen as to LzLabs Topic Nos. 58 and 59. With regard to Topic 59, IBM will designate Ms. Mogensen to testify at a reasonable level of detail as to non-privileged information related to IBM's costs, revenues, and profits from the usage of IBM's current line of Z mainframes running z/OS.

Please confirm by Thursday, March 28 that you intend to proceed with Ms. Mogensen's deposition on April 4.

Regards,

Noah Frank

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